

Message

From: Hobel, Lawrence [Lhobel@cov.com]
Sent: 8/31/2017 11:22:15 PM
To: Bradfish, Larry [Bradfish.Larry@epa.gov]; Luke, Cheryl (ENRD) [Cheryl.Luke@usdoj.gov]; Keller, Lynn [Keller.Lynn@epa.gov]
CC: ROJAS-MICKELSON, DAEWON [rojas-mickelson.daewon@epa.gov]; Fennessy, Christopher (christopher.fennessy@Rocket.com) [christopher.fennessy@Rocket.com]; Hvidsten, William [william.hvidsten@Rocket.com]; Goulart, Scott [scott.goulart@Rocket.com]; Feng, Wendy [wfeng@cov.com]
Subject: Boundary Operable Unit

This email confirms that Aerojet Rocketdyne (AR) does not request that DoJ/EPA enter into consent decree negotiations relative to an enforcement vehicle for implementation of the Boundary Operable Unit ROD. AR understands that EPA intends to issue a unilateral administrative order. AR looks forward to receiving and reviewing it and will provide comments, as appropriate. Four immediate thoughts: (1) if EPA takes the lead in overseeing remedy implementation, it needs to ensure that any onsite oversight is undertaken by Sacramento based consultants to avoid unnecessary cost (or delegate the onsite oversight to the State) (2) there are over 80 remedial action areas and the UAO needs to recognize phasing and flexibility relative to remedy implementation; (3) the BOU ROD assumed that its onsite business operations were going to be active whereas AR has announced that it will be moving most of these operations and activities away from the Sacramento Site, which can impact risk evaluations and remedy; and (4) timely availability for AR/EPA senior management meetings to discuss issues/progress.

I trust this meets your needs as to AR's position as to CD vs. UAO.

Regards,
Larry

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From: Bradfish, Larry [mailto:Bradfish.Larry@epa.gov]
Sent: Wednesday, August 30, 2017 3:04 PM
To: Hobel, Lawrence <Lhobel@cov.com>
Cc: Luke, Cheryl (ENRD) <Cheryl.Luke@usdoj.gov>; Keller, Lynn <Keller.Lynn@epa.gov>; ROJAS-MICKELSON, DAEWON <rojas-mickelson.daewon@epa.gov>
Subject: Aerojet -- status

Larry,

Thank you for your voice mail update on the status of the cost CD and UAO. We look forward to your response this week (or next). Regarding Area 40, we received an email today from Chris Fennessy inquiring about the status of proposed language. I am still a little unclear what this language is going to be used for. I have looked it over and provided some initial suggestions to the EPM RPM, Lynn Keller. However, I think the sequencing and deliverables

related to this hybrid state-federal approach is still somewhat uncertain. We may need to contact the state to get clarification and agreement on some elements of this process.

Larry

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